

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No: 4:21CR00536 AGF
)	(NCC)
CHRISTOPHER M. FRANKLIN,)	(<u>UNDER SEAL</u>)
)	
Defendant.)	

MOTION AND REQUEST FOR LEAVE TO FILE
DEFENDANT'S MOTION FOR RELEASE FROM DETENTION UNDER SEAL

COMES NOW the Defendant, CHRISTOPHER M. FRANKLIN, by and through his attorneys of record, Ethan B. Corlija and Joseph M. Hogan, and hereby moves this Honorable Court to issue an Order permitting the filing under seal of the unredacted Defendant's Motion for Release from Detention.

Defendant's Motion for Release from Detention contains confidential information relative to communications Defendant is having with the Government. Defendant's motion also contains information about his mental health history and condition.

For these reasons, the Defendant respectfully requests that the Court issue an Order allowing leave to file Defendant's Motion for Release from Detention under seal. Legal counsel for Defendant have contacted counsel for the Government and state that the Government does not oppose this motion.

WHEREFORE, Defendant, by and through defense counsel, respectfully requests that this Honorable Court enter an Order granting leave to file Defendant's Motion for Release from Detention under seal in the above case.

Respectfully Submitted,

ETHAN B. CORLIJA
ATTORNEY AT LAW

/s/ Ethan B. Corlija
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I, Ethan B. Corlija, legal counsel for Defendant herein, **CHRISTOPHER M. FRANKLIN**, certify that a true and accurate copy of the forgoing Motion and Request for Leave to File Defendant's Motion for Release from Detention Under Seal has been forwarded to counsel of record for the United States of America at the following address this 17th day of December 2021:

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/s/ Ethan B. Corlija
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